

REMARKS

Applicants acknowledge receipt of the Office Action dated July 20, 2007, in which the Examiner objected to the Drawings, rejected claims 2 and 3 under § 112, second paragraph, rejected claims 1-3 as obvious over the combination of Girard (US 3605159) with Johnson (US 7086476), and rejected claim 4 as obvious in view of the combination of Girard with Johnson and Knapp.

Applicants have amended the application and respectfully request that the application is in condition for allowance for the reasons set out below.

Drawings

A sheet of Replacement Drawings that comply with the Rules is included herewith.

Rejection of the claims under § 112

Claims 2 and 3 are rejected as indefinite, inasmuch as claims 2 and 3 conflict with the scope of claim 1. Claim 1 has been amended to remove the limitation that caused the conflict, so Applicant respectfully submits that the grounds for this rejection is cured.

The limitation that was previously included in claim 1 has been written as new claim 5.

Obviousness rejection of the claims

In support of the rejection, the Examiner cites Girard, which discloses a pig, and Johnson, which discloses an expandable tube having a pattern of longitudinal slits. It is important to note, however, that Johnson does not disclose a pig, pump plug, or any other device for preventing longitudinal fluid flow past the device. Rather, Johnson discloses an expandable device for use in a *production flow line*. Because the device of Johnson is used in a production flow line, it is critical to the operability of Johnson that fluids be able to flow through the device, regardless of whether it is in an expanded or

contracted position. Thus, Johnson does not provide a circumferential seal, as in the present invention.

Claim 1 has been amended to require that the slits are each closed at at least one end to prevent fluid flow along the body while allowing the bars to displace into the body. Johnson is intended for a purpose that is completely unrelated to that of Girard and the present invention, *i.e.* Johnson relates to a immobile deployment through which fluid must be able to flow, rather than to a mobile deployment through which fluid must not be able to flow. Thus, there would be no reason to combine the teachings of Johnson with those of Girard and no reason to believe that the combination would produce a device meeting the limitations of the present claims.

Concluding remarks

Applicants believe that each rejection or objection raised by the Examiner in the Office Action has been addressed. Applicants respectfully submit that the current claims are in condition for allowance. Applicants therefore request that the Examiner reconsider and withdraw the rejection and allow the case to issue.

If the Examiner has any questions regarding the foregoing, she is requested to telephone the undersigned at (713) 241-1041 prior to the issuance of any written action.

Respectfully submitted,
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